

Our File No.: 43618
MORTON & CRAIG, LLC
110 Marter Avenue
Suite 301
Moorestown, NJ 08057
(856)866-0100
Attorney for Daimler Trust
JM5630 _____

IN RE
CHRISTINE CRANDON
VINCENT J. CRANDON

UNITED STATES
BANKRUPTCY COURT FOR
THE DISTRICT OF NEW
JERSEY

CHAPTER 7
CASE NO: 16-34616(JKS)
HEARING DATE: 2-21-2017

NOTICE OF MOTION OF
DAIMLER TRUST TO
MODIFY THE AUTOMATIC
STAY

To:

Christine and Vincent Crandon
14 James Brite Circle
Mahwah, NJ 07430
Debtor

David E. Sklar, Esq.
1599 Hamburg Turnpike
Wayne, NJ 07470
Attorney for the debtor

Eric R. Perkins
40 West Ridgewood Avenue
Ridgewood, NJ 07450
Trustee

John R. Morton, Jr., Esquire, attorney for Daimler Trust, has filed papers with the Court for relief from the automatic stay to permit Daimler Trust to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court
50 Walnut Street
PO Box 1352
Newark, NJ 07101-1352

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire
110 Marter Avenue, Suite 301
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not

present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

Attend the hearing scheduled to be held on February 21, 2017 at 10 a.m. in Courtroom #3D, United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 1-31-2017

/s/ John R. Morton, Jr., Esquire
John R. Morton, Jr., Esquire
Attorney for Daimler Trust